

PERMIT AMENDMENT NO. 2843-313-0116-S-07-2
ISSUANCE DATE:



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality – Permit Amendment

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. **2843-313-0116-S-07-0** issued on June 25, 2018 to:

Facility Name: **Harcros Chemicals, Inc.**
Facility Address: **3452 Corporate Drive**
Dalton, Georgia 30720 (Whitfield County)
Mailing Address: **3452 Corporate Drive**
Dalton, Georgia 30720
Facility AIRS Number: **04-13- 31300116**

for the following: The operation of a chemical manufacturing and distribution facility including the construction and operation of a new Calcium Sulfonate process, a Hydroxy Sultaine process, a Flocculant 158 process, a Hydroxypropyl Carbamate process, and new Acid Phosphates process. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

is hereby amended as follows: Production of five new products, updates to several existing processes and elimination of fatty acid chlorides and phosphorus acid production.

Reason for Amendment: Application No. 28534 dated August 9, 2022

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 page(s).

This Permit Amendment is hereby made a part of Permit No. **2843-313-0116-S-07-0** and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.



Richard E. Dunn, Director
Environmental Protection Division

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2. Allowable Emissions

MODIFIED CONDITION

- 2.3 The Permittee shall not discharge methanol to the wastewater system from the calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processes in an amount equal to or exceeding 135 tons during any twelve consecutive months.
[Avoidance of 40 CFR Part 63 Major Source Applicability, Avoidance of 40 CFR Part 70 Applicability and Georgia Air Toxic Guidelines].

MODIFIED CONDITION

- 2.4 The Permittee shall limit the number of batches of calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processed such that the amount does not equal to or exceed 180 batches during any twelve consecutive months.
[Avoidance of 40 CFR Part 63 Major Source Applicability, Avoidance of 40 CFR Part 70, Applicability and Georgia Air Toxic Guidelines].

MODIFIED CONDITION

- 2.5 The Permittee shall operate Carbon Drums C08, C10 and C11 at all times during the methyl acid phosphate process in Reactors R08, R10 and R11.
[Avoidance of 40 CFR Part 63 Major Source Applicability, Avoidance of 40 CFR Part 70 Applicability and Georgia Air Toxic Guidelines].

NEW CONDITION

- 2.12 The Permittee shall comply with all applicable provisions of Federal Standard 40 CFR Part 60 Subpart VVa – “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After November 7, 2006.
[40 CFR 60 Subpart VVa]

NEW CONDITION

- 2.13 The Permittee shall not produce more than 1,000 Mg (1,102 tons) of sodium acetate during any twelve consecutive months.
[Avoidance of 40 CFR Part 60 Subpart VVa]

5. Monitoring

MODIFIED CONDITION

- 5.2 The Permittee shall replace the scrubbant in Scrubber S08 with fresh makeup water after every batch of ammonia manufactured in Tanks T241 and T243. If Tank T241 and T243 are down, the scrubbant in Scrubber S08 shall be replaced with fresh water at a minimum of once every day.

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MODIFIED CONDITION

- 5.4 The Permittee shall either replace the carbon in Carbon Drums C292, C07, C08, C09, C10 and/or C11 once every two weeks or measure and record the exhaust VOC concentration for Carbon Drums 292, C07, C08, ~~C09~~, C10 and/or C11 once every two weeks, except as allowed below. The Permittee shall also replace the carbon in a unit when the VOC concentration of the exhaust equals or exceeds 20 parts per million (ppm). The Permittee shall maintain a log for the units as described in Condition 7.5.
- a. For Carbon Drums C292, C07, C08, C09, C10 and/or C11, if acid phosphate, calcium sulfonate, Flocculant 158 or hydroxy sultaine batches are more than two weeks apart, VOC concentration monitoring shall be conducted on the next batch, or the carbon drum will be replaced before the next batch.

MODIFIED CONDITION

- 5.10 The Permittee shall monitor and record the amount of methanol sent to the wastewater system from the calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processes. The log shall be maintained in a condition suitable for inspection by, or submittal to, the Division.

MODIFIED CONDITION

- 5.11 The Permittee shall monitor and record the number of batches of calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processed. The log shall be maintained in a condition suitable for inspection by, or submittal to, the Division.

NEW CONDITION

- 5.12 The Permittee shall monitor and record the total production of sodium acetate each month. The log shall be maintained in a condition suitable for inspection by, or submittal to, the Division.

7. Notification, Reporting and Record Keeping Requirements

MODIFIED CONDITION

- 7.3 The Permittee shall maintain a production log for ammonia manufactured in Tanks T241 and T243. The log shall at a minimum contain the date and time of each batch of ammonia manufactured and the date and time of Scrubber S08 scrubbant replacement.

- 7.4 Deleted

MODIFIED CONDITION

- 7.5 The Permittee shall maintain a log containing the following information for Carbon Drums C292, C07, C08, C09, C10 and/or C11.
- a. The identity of the carbon unit.
- b. Results of the bi-monthly exhaust measurement. If no measurements were taken as allowed by Condition 5.4, the log shall state so.
- c. The date the carbon was replaced.

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MODIFIED CONDITION

- 7.9 The Permittee shall submit a written report postmarked within 30 days after the semiannual period as prescribed by the Division semiannual. The semiannual periods shall cover the periods of January 1 to June 30 and July 1 to December 31. The report shall contain as a minimum the following:
- a. The nature and cause of the deviation, the time and date of occurrences, and any initial and final corrective action taken.
 - b. A summary of any days for which any of the required operation and maintenance surveillance checks were not made and the reason for such failure to perform the surveillance.
 - c. All records of the deviated measurements.
 - d. Any corrective actions taken to prevent any further deviations.
 - e. The twelve consecutive month total amount of methanol released to the wastewater system from the calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processes for each calendar month in the semi-annual period, based on the calculations in Condition 7.13.
 - f. The twelve consecutive month total amount of batches of calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processed for each calendar month in the semi-annual period, based on the calculations in Condition 7.16.

MODIFIED CONDITION

- 7.12 The Permittee shall use the methanol monitoring logs per Condition 5.10 to determine the monthly amount of methanol sent to the wastewater system from the calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processes.

MODIFIED CONDITION

- 7.13 The Permittee shall use the records required by Condition 7.12 to calculate the 12 consecutive month amount of methanol to demonstrate compliance with Condition 2.3. All demonstration calculations, including any Division-approved emission factors, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in this condition. The Permittee shall notify the Division in writing if the mass of methanol sent to the wastewater system from the calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processes exceed 11.3 tons total during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.3.

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MODIFIED CONDITION

- 7.14 The Permittee shall use the calculations required by Condition 7.13 to determine the twelve consecutive month total amount of methanol sent to the wastewater system from the calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processes for each calendar month. The Permittee shall notify the Division in writing if the amount of methanol equals or exceeds 135 tons during any consecutive twelve month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the methanol limit in Condition 2.3.

MODIFIED CONDITION

- 7.15 The Permittee shall use the batches processed logs per Condition 5.11 to determine the monthly amount of batches of calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processed.

MODIFIED CONDITION

- 7.16 The Permittee shall use the records required by Condition 7.15 to calculate the 12 consecutive month number of batches to demonstrate compliance with Condition 2.4. All demonstration calculations, including any Division-approved emission factors, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in this condition. The Permittee shall notify the Division in writing if the number of batches of calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processed exceeds 15 batches total during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the batches limit in Condition 2.4.

MODIFIED CONDITION

- 7.17 The Permittee shall use the calculations required by Condition 7.16 to determine the twelve consecutive month total amount of batches of calcium sulfonate P-1220, P-1220BUST, P-1220EH and P-1220PG processed each calendar month. The Permittee shall notify the Division in writing if the number of batches equals or exceeds 180 batches during any consecutive twelve-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.4.

NEW CONDITION

- 7.18 The Permittee shall use the records required by Condition 5.12 to calculate the 12 consecutive month total production of sodium acetate to demonstrate compliance with Condition 2.13. The Permittee shall notify the Division in writing if the total production of sodium acetate exceeds 91.6 tons per month during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the sodium acetate production limit in Condition 2.13.

NEW CONDITION

- 7.19 The Permittee shall provide written notification of startup and operation of the proposed modifications included in Application Number 28534 within 30 days of commencing startup and/or operation.
[391-3-1-.03(2)(c)]